

**REMARKS**

Claims 21-32 are pending in the present application. Claims 24, 28 and 32 have been amended herewith. Reconsideration of the claims is respectfully requested.

**I. 35 U.S.C. § 103, Obviousness**

The Examiner rejected Claims 21-23, 25-27 and 29-31 under 35 U.S.C. § 103 as being unpatentable over Mason et al (4,503,499) in view of Blelloch et al (6,434,590). This rejection is respectfully traversed.

The present invention provides a method, apparatus, and computer program product for chaining applications. A requesting application requests a service as a series of applications by requesting a service by name. A properties file associates the service name to a chaining module and also associates an option for the chaining module with a series of applications. Thus, a requesting application may request multiple applications to be executed in-series/in-order, and an output of one application in the series may be passed to the input of the next application. Thus, the requesting application need not invoke each application and pass results to the next application, and in fact the chaining of the applications can be transparent to the requesting application. In contrast, per the teachings of the cited Mason reference, files are transmitted to users for user co-action therewith in response to certain prerequisites being fulfilled (Col. 2, lines 10-26; column 5, lines 7-25; column 31, lines 47-68). Applications are not chained together for automatic execution amongst such applications. Instead, a file is sent to a user for manual user processing using a command line prompt for the user's entering of subsequent processing commands (column 32, lines 1-10).

Specifically with respect to Claim 21, such claim recites "storing in a properties file a service name that identifies a service associated with a chaining module and an option that associates the service name with a series of applications". As can be seen, Claim 21 recites a properties file, and stored in this properties file is (1) a service name that identifies a service associated with a chaining module, and (2) an option that associates this service name with a series of applications. In rejecting this aspect of Claim 21, the Examiner cites Mason's teaching at col. 1, lines 11-13 and col. 21, lines 45-50 as teaching the claimed storing step. Applicants show error in such assertion as follows.

The cited passage at Mason col. 1, lines 11-13 states:

"This invention relates to a data processing system for improving the management of work performed by a large number of workers carrying out related interdependent tasks and, more particularly, to a system for automating office procedure to coordinate the flow of work on documents and the transmittal of documents between office personnel."

As can be seen, this general statement regarding coordination of the flow of work on documents merely states that documents are 'transmitted' between office personnel. There is no teaching or other suggestion of any specific step with respect to storing anything in a properties file, such as storing the two specific items expressly enumerated in Claim 21 – (1) a service name that identifies a service associated with a chaining module, and (2) an option that associates this service name with a series of applications. The only other passage cited in rejecting this storing step is Mason col. 21, lines 45-50. There, Mason states:

"The program then proceeds into instruction sequence 225 in which it sends a wake-up signal to the dispatch process so that if the dispatch process is sleeping in routine 129, it will wake up and again proceed through the effort table and attempt to dispatch the event packets of each effort which have their reattempt flags set. After instruction sequence 225, the program proceeds into instruction sequence 217, in which a response is sent to the work interface program from which the COMPLETE request was received indicating that it has successfully completed the complete server subprocess and the program then ends."

As can be seen, this passage describes the waking up of a dispatch process, and this dispatch process proceeds through the effort table and attempts to dispatch the event packets of each effort that has its reattempt flag set. In addition, a response is sent to the work interface program to indicate a successfully completed process. Thus, this cited passage teaches (1) sending a wake-up signal, (2) attempting to dispatch event packets, and (3) sending a completion response. There is no teaching or suggestion of any type of storing step, and in particular there is no

teaching or suggestion of the specific claimed step of storing in a properties file (1) a service name that identifies a service associated with a chaining module and (2) an option that associates the service name with a series of applications". Thus, a prima facie case of obviousness has not been established with respect to Claim 21<sup>1</sup>, and accordingly the burden has not shifted to Applicants to rebut this improper obviousness assertion<sup>2</sup>. In addition, as a proper prima facie case of obviousness has not been established, Claim 21 has been erroneously rejected<sup>3</sup>.

Applicants initially traverse the rejection of Claims 22 and 23 for reasons given above with respect to Claim 21 (of which Claims 22 and 23 depend upon).

Further with respect to Claim 23, it is urged that none of the cited references teach or suggest the claimed feature of "wherein a second application in the series of applications is a natural language translation engine". In rejecting Claim 23, the Examiner cites Mason's teachings at col. 42, lines 42-52 as teaching this claimed feature. Applicants show that there, Mason states:

"said second data processing means having information storage means to store the packets transmitted thereto from said first data processing means over said transmission means, display means connected to said second data processing means to display data in human readable form, said second data processing means including data control means operable to cause said display means to display the identification of the work events corresponding to packets stored in said information storage means of said second data processing means"

As can be seen, this passage describes a storage means for the storage of packets and a display means for the display of data in human readable form. In addition, a data control means causes

<sup>1</sup> To establish prima facie obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. *See also, In re Royka*, 490 F.2d 580 (C.C.P.A. 1974).

<sup>2</sup> In rejecting claims under 35 U.S.C. Section 103, the examiner bears the initial burden of presenting a prima facie case of obviousness. *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). Only if that burden is met, does the burden of coming forward with evidence or argument shift to the applicant. *Id.*

<sup>3</sup> If the examiner fails to establish a prima facie case, the rejection is improper and will be overturned. *In re Fine*, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988).

the display means to display the identification of work events corresponding to the stored packets. While the display means can display data in human readable form, there is no teaching or suggestion that such display of data is with respect to, or otherwise associated with, a series of applications that are activated by a chaining module (which issues a request to each application within the series of applications). Claim 23 expressly states that *a second application in the series of applications* is a natural language translation engine (with the series of applications being defined in Claim 21 to be controlled by a chaining module which issues requests to each application within the series of applications in order). Thus, even to the extent that a display for displaying data in human readable form is alleged to read on the claimed natural language translation engine, such display is not operable per the specifically recited features of Claim 23 in combination with Claim 21 – specifically, such display is not part of a chained set of applications controlled by a chaining module. Thus, Claim 23 is further shown to not be obvious in view of the cited references.

Applicants traverse the rejection of Claims 25-27 and 29-31 for similar reasons to those given above with respect to Claim 21.

Applicants further traverse the rejection of Claims 27 and 31 for similar reasons to the further reasons given above with respect to Claim 23.

Therefore, the rejection of Claims 21-23, 25-27 and 29-31 under 35 U.S.C. § 103 has been overcome.

## II. Objection to Claims

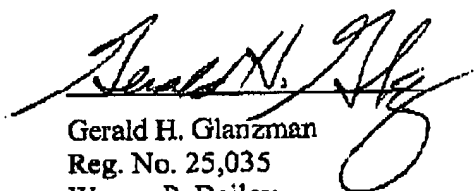
The Examiner stated that Claims 24, 28 and 32 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In response, the claims have been rewritten to overcome this objection.

**III. Conclusion**

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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